

LAW OFFICES OF
MICHAEL K. CHONG LLC
1250 BROADWAY 36TH FL, SUITE 300
NEW YORK, NEW YORK 10001
(212) 726-1104 FAX (212) 726-3104

WWW.MKCLAWGROUP.COM

MICHAEL K. CHONG ‡

‡ MEMBER, NJ BAR, U.S.D.C. NEW JERSEY
SDNY, NEW YORK
EDNY, NEW YORK
U.S.C.A. 2ND CIRCUIT

FORT LEE:
2 EXECUTIVE DRIVE, STE. 720
FORT LEE, NEW JERSEY 07024
(201) 708-6675 FAX (201) 708-6676

* Please Reply to: FORT LEE

HOBOKEN:
300 HUDSON STREET, STE. 10
HOBOKEN, NEW JERSEY 07024
(201) 203-7476 FAX (201) 708-6676

DIRECT DIAL: (201) 947-5200
EMAIL: MKC@MKCLAWGROUP.COM

February 19, 2016

Via ECF

Hon. Steven I. Locke, U.S.M.J.
U.S. Courthouse
100 Federal Plaza, Courtroom 820
Central Islip, NY 11722

Re: Siancas et al. v. Exclusive Detailing Inc. et al.
Docket No.: 2:14-cv-6151

Dear Judge Locke:

This office represents defendants in the above referenced matter. As the Court is aware, this matter is scheduled for a Settlement Conference before Your Honor on February 23, 2016 at 2:00 p.m. In furtherance of same, the parties are required to submit an *ex parte* settlement position to the Court twenty-four (24) hours prior to the conference. We respectfully submit this correspondence as notice to the Court that, in light of this lawsuit and the numerous other lawsuits recently filed against the defendants, our client has been forced into seeking Bankruptcy protection pursuant to 11 U.S. Code Chapter 7.

In good faith, our client diligently sought alternatives to filing for Bankruptcy, but their present state of financial affairs renders them incapable of defending these lawsuits or meeting their other outstanding financial obligations. The anticipated filing date is Monday, February 22, 2016. As such, it is respectfully submitted that an appearance at the Settlement Conference scheduled for Monday, February 22, 2016 would be moot, pursuant to the Bankruptcy protection afforded under 11 U.S.C. 362(a)(1). If the court requires, I can be available by phone if needed for the above conference. Thank you for your consideration and courtesies.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/

cc: Steven Moser, Esq. (Plaintiff's counsel)
James McGrath, Esq. (Co-Defendants' counsel)